

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Civil Division

CAMERON DORSEY
301 7th Street, N.E., Apt. 2
Washington, D.C. 20002

Plaintiff,

v.

TRUMP OLD POST OFFICE, LLC t/a
TRUMP INTERNATIONAL HOTEL
WASHINGTON, DC
1100 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Serve: National Registered Agents, Inc.
1015 15th Street, N.W. Suite 1000
Washington, D.C. 20005

Defendant.

C.A. No. 2019 CA 007427 B

Judge Florence Y. Pan

FIRST AMENDED COMPLAINT FOR DAMAGES
(Negligence: Premise Liability)

Plaintiff, Cameron Dorsey, by and through her attorney, Patrick M. Regan, and the law firm of Regan Zambri Long PLLC, hereby files this Complaint against Defendant and in support thereof states the following:

JURISDICTION AND VENUE

1. Jurisdiction is proper in this court pursuant to D.C. Code § 11-921(a)(6).
2. Pursuant to D.C. Code § 13-423(a)(3), venue is appropriate in this Court since the cause of action arose as a result of Defendant's causing tortious injury by an act or omission in the District of Columbia.

PARTIES

3. Plaintiff Cameron Dorsey was at all times relevant herein an adult citizen and resident of the District of Columbia.

4. Upon information and belief, Defendant Trump Old Post Office, LLC t/a Trump International Hotel (hereinafter “Defendant Trump ”) is a company which at all relevant times was engaged in business in the District of Columbia.

FACTS

5. On January 25, 2018, Plaintiff was a guest at the Benjamin Bar in the Trump Hotel in Washington, D.C.

6. At the same time and place referenced in the preceding paragraph, the General Manager of the Trump Hotel was using a saber to open a champagne bottle and a piece of glass flew and struck Ms. Dorsey in the face.

7. Ms. Dorsey was severely gashed on her chin with the shard of glass cut from the champagne bottle. The gash on her chin began bleeding profusely immediately and security at the hotel called an ambulance.

8. Plaintiff was transported by ambulance to the Emergency Department at Georgetown University Hospital and received treatment for her injuries.

9. As a result of this incident, Ms. Dorsey suffered a serious injury which required several stitches, and she is left with a large permanent scar on her chin despite several medical treatments.

COUNT I
(Negligence: Premises Liability)

10. Plaintiff incorporates, by reference, paragraphs 1 through 9, above, and further alleges that Defendant owed a duty to Ms. Dorsey, its customer and invitee, to keep the premises in a reasonably safe condition and to avoid creating hazardous conditions that were under its direction, control, and/or management.

11. Plaintiff further alleges that Defendant Trump, through its agents, servants and/or employees, breached this duty in all or some of the following respects: by opening a champagne bottle in a dangerous and hazardous fashion; by using a dangerous implement in a careless and hazardous manner thereby subjecting its customers and invitees to the risk of serious personal injury; and by otherwise failing to act with reasonable care as the operator under the circumstances.

12. Plaintiff further alleges that as a direct and proximate result of Defendant Trump's negligence, Ms. Dorsey suffered substantial injuries, including a deep wound on her chin, loss of blood, several stitches, large permanent scar, and post-traumatic stress disorder, as well as significant pain, suffering, and loss of enjoyment of life.

13. As a further direct and proximate result of the incident caused by Defendant Trump's negligence, Plaintiff has incurred economic losses, including lost wages and substantial expenses for medical care and treatment.

WHEREFORE, Plaintiff Cameron Dorsey demands judgment against Defendant Trump in the full and just amount of Three Hundred and Fifty Thousand Dollars (\$350,000.00), plus interest and costs of this proceeding.

JURY TRIAL DEMAND

Plaintiff requests a trial by jury on all of the above claims.

Respectfully submitted,

REGAN ZAMBRI LONG

By: /s/ Patrick M. Regan
Patrick M. Regan #336107
pregan@reganfirm.com
Christopher J. Regan #1018148
cregan@reganfirm.com
Emily Lagan #1645159
elagan@reganfirm.com
1919 M Street NW, Suite 350
Washington, DC 20036
PH: (202) 463-3030
FX: (202) 463-0667
Counsel for Plaintiff

Regan Zambri Long
1919 M Street, NW
Suite 350
Washington, D.C. 20036

202-463-3030